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*Attorneys for Defendants Digital Licensing Inc., Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, Roydon B. Nelson, and Relief Defendants Business Funding Solutions, LLC; Blox Lending, LLC; The Gold Collective LLC; and UIU Holdings, LLC*

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH**

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SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENAJMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah limited liability company; BRENDAN J.

**DEFENDANTS DIGITAL LICENSING INC.  
(D/B/A “DEBT BOX”), JASON R.  
ANDERSON, JACOB S. ANDERSON,  
SCHAD E. BRANNON, AND ROYDON  
B. NELSON AND RELIEF  
DEFENDANTS BUSINESS FUNDING  
SOLUTIONS, LLC, BLOX LENDING,  
LLC, THE GOLD COLLECTIVE LLC,  
AND UIU HOLDINGS, LLC’S MOTION  
FOR ATTORNEYS’ FEES FOR  
KUNZLER BEAN & ADAMSON**

Case No. 2:23-cv-00482-RJS  
Chief Judge Robert J. Shelby  
Magistrate Judge Dustin B. Pead

**REDACTED VERSION**

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STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual;

Defendants,

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRITZ HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

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Pursuant to the Court’s Memorandum Decision and Order (ECF No. 275) entered on March 18, 2024, Defendants Digital Licensing Inc. (d/b/a “DEBT Box”), Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, and Roydon B. Nelson, and Relief Defendants Business Funding Solutions, LLC, Blox Lending, LLC, The Gold Collective LLC, and UIU Holdings, LLC (collectively, the “DEBT Box Defendants”), through counsel, respectfully requests the Court for an award of attorneys’ fees against Plaintiff Securities and Exchange Commission (the “Commission”) for “engag[ing] in bad faith conduct in seeking, obtaining, and defending the ex parte TRO, asset freeze, and appointment of a receiver.” Memorandum Decision and Order at 79.

As shown in the Declaration of Matthew R. Lewis in Support of the DEBT Box Defendants’ Application for Attorneys’ Fees for Kunzler Bean & Adamson (“Lewis Declaration”),

from the date of Kunzler Bean & Adamson's retention to October 6, 2023, the date of the TRO dissolution hearing, the DEBT Box Defendants have incurred attorney's fees arising from the Temporary Restraining Order ("TRO") and appointment of the Receiver totaling \$34,259.50. *See* Lewis Declaration, attached hereto as Exhibit A. In addition, information detailing the basis for those fees has been included, under seal, as Exhibit 1 to the Lewis Declaration.

WHEREFORE, the DEBT Box Defendants respectfully request the Court to grant this motion in full.

DATED: April 17, 2024

Respectfully submitted,

**KUNZLER BEAN & ADAMSON, PC**

/s/ Matthew R. Lewis

Matthew R. Lewis

Taylor J. Smith

*Attorneys for Defendants Digital Licensing Inc.,  
Jason R. Anderson, Jacob S. Anderson, Schad E.  
Brannon, Roydon B. Nelson, and Relief Defendants  
Business Funding Solutions, LLC; Blox Lending,  
LLC; The Gold Collective LLC; and UIU Holdings,  
LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 17th day of April 2024, I filed a true and correct copy of the foregoing **DEFENDANTS DIGITAL LICENSING INC. (D/B/A “DEBT BOX”), JASON R. ANDERSON, JACOB S. ANDERSON, SCHAD E. BRANNON, AND ROYDON B. NELSON AND RELIEF DEFENDANTS BUSINESS FUNDING SOLUTIONS, LLC, BLOX LENDING, LLC, THE GOLD COLLECTIVE LLC, AND UIU HOLDINGS, LLC’S MOTION FOR ATTORNEYS’ FEES FOR KUNZLER BEAN & ADAMSON** through the Court’s electronic filing system, which effectuated service on all counsel of record.

/s/ Michelle Hansen  
Michelle Hansen